

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
10801 W. CHARLESTON BLVD.
SUITE 500
LAS VEGAS, NV 89135
TELEPHONE: 702.369.6800

SUZANNE L. MARTIN
Nevada Bar No. 8833
suzanne.martin@ogletree.com
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
10801 W. Charleston Blvd.
Suite 500
Las Vegas, NV 89135
Telephone: 702.369.6800
Fax: 702.369.6888

MICHELLE C. KRAKORA
Nevada Bar No. 8832
michelle.krakora@ogletree.com
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
200 S. Virginia Street, 8th Floor
Reno, NV 89501
Telephone: 775.234.3925
Fax: 775.440.2376

*Attorneys for Defendants Vocatus, LLC and
Shamoun's, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERIN ALLEN,

Plaintiff,

vs.

VOCATUS, LLC, a Nevada Limited Liability
Company; SHAMOUN'S, LLC, a Nevada
Limited Liability Company; and DOES and
ROE entities I – X, inclusive,

Defendants.

Case No. 2:21-cv-00377-APG-DJA

**STIPULATION AND ORDER
TO EXTEND TIME FOR
PARTIES TO SUBMIT
JOINT PRETRIAL ORDER**

(THIRD REQUEST)

Defendants VOCATUS, LLC and SHAMOUN'S, LLC ("Defendants"), and Plaintiff ERIN ALLEN ("Plaintiff") (collectively the "Parties"), by and through their respective undersigned counsel, stipulate to, and agree upon, an extension of the deadline to submit a joint pretrial order to July 1, 2023, sixty (60) days after the scheduled settlement conference. This is the Parties' third request to extend the deadline to submit a joint pretrial order and is not made for purposes of undue

1 delay as discussed in further detail below.

2 1. On December 12, 2022, this Court entered its Order granting in part and denying in
3 part Defendants' Motion for Summary Judgment. (ECF No. 54.) The Parties were due to submit
4 their joint pretrial order thirty (30) days from the Court's Order regarding Defendants' Motion for
5 Summary Judgment, i.e., January 11, 2023. (ECF No. 34). On January 11, 2023, this Court
6 approved the Parties' stipulation to extend the deadline to submit the joint pretrial order to
7 February 10, 2023. (ECF No. 56.)

8 2. On February 9, 2023, this Court approved the Parties' second request for stipulation
9 to extend the deadline to submit the joint pretrial order to April 11, 2023, and granted the Parties'
10 request for a settlement conference. (ECF No. 58.)

11 3. On February 13, 2023, the settlement conference was set for April 9, 2023. (ECF
12 No. 59.) On February 22, 2023, this Court approved the Parties' stipulation to reset the settlement
13 conference to May 2, 2023 at 10:00 a.m. (ECF No. 61.)

14 4. The Parties therefore request that the deadline to submit the joint pretrial order be
15 extended to sixty (60) days after the May 2, 2023 settlement conference, to **July 1, 2023**.

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

This stipulation is not brought for purposes of delay or any other improper purpose.

DATED this 9th day of March, 2023.

DATED this 9th day of March, 2023.

HKM EMPLOYMENT ATTORNEYS LLP

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

/s/ Michael Arata

/s/ Suzanne L. Martin

Jenny L. Foley

Suzanne L. Martin

Nevada Bar No. 9017

Nevada Bar No. 8833

Michael Arata

10801 W. Charleston Blvd.

Nevada Bar No. 11902

Suite 500

101 Convention Center Drive

Las Vegas, NV 89135

Suite 600

Las Vegas, NV 89109

Michelle C. Krakora

Nevada Bar No. 8832

Attorneys for Plaintiff

200 S. Virginia Street

8th Floor

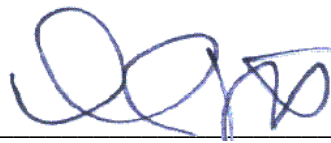
Reno, NV 89501

*Attorneys for Defendants Vocatus, LLC and
Shamoun's, LLC*

ORDER

IT IS SO ORDERED:

DATED: March 10, 2023



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE